

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

GEORGE MOORE and VIRGINIA CARTER, )  
on behalf of themselves and )  
all others similarly situated, )

Plaintiffs, )

vs. )

COMPASS GROUP USA, INC., D/B/A )  
Canteen )

Defendant. )

Case No. 4:18-cv-01962

**DEFENDANT COMPASS GROUP USA, INC.'S SUPPLEMENT TO RULE 26(a)**  
**DISCLOSURES**

Pursuant to Rule 26(a)(1) and (e)(1) of the Federal Rules of Civil Procedure, Defendant Compass Group USA, Inc. d/b/a Canteen (“Compass”) hereby supplements its initial disclosure statement (the “Initial Disclosures”). The Initial Disclosures are based on the information reasonably available to, currently known by, and currently in the possession, custody, or control of Compass regarding the disputed facts alleged in the Consolidated Amended Complaint (“Complaint”) of Plaintiffs George Moore, Virginia Carter, James Jilek, Francis Jaye, and Sean Madelmayer (“Plaintiffs”). To the best of Compass’s knowledge, information, and belief, these supplemental disclosures are complete and correct as of the date they are made. Compass reserves the right to supplement the Initial Disclosures during the course of discovery, and as its investigation continues, as required by Rule 26 of the Federal Rules of Civil Procedure.

Compass expressly reserves its rights to: (a) make subsequent revision, supplementation, or amendment to these disclosures based on any information, evidence, documents, facts, or things which hereafter may be discovered, or the relevance of which hereafter may be discovered; and

(b) identify, produce, introduce, or rely on additional or subsequently identified, acquired, or discovered writings, evidence, and information at trial or in any pretrial proceedings held herein.

Compass objects to any disclosures of information or documents beyond that which is required by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules of the United States District Court for the Eastern District of Missouri, or other applicable law. Compass does not provide herein any information or documents protected from disclosure by the attorney-client privilege, the attorney work product doctrine, applicable regulatory privileges, or any other privilege or immunity. Compass objects to the disclosure of any confidential and proprietary business or financial information and any confidential personal information. At a minimum, Compass objects to disclosing or producing such information absent the entry of a mutually-agreed-on order by the Court sufficiently protecting the confidentiality of such information. Any information provided by Compass in connection with these Initial Disclosures is subject to all objections as to competence, relevance, materiality, and admissibility, and to any other objections on any grounds that if such information were offered into evidence, would require the exclusion thereof, and Compass expressly reserves all such objections and grounds. These Initial Disclosures shall not be deemed a waiver of any defense identified in Rule 12(b) of the Federal Rules of Civil Procedure.

## **I. INSURANCE DOCUMENTS**

As of the date of these disclosures, Compass identifies the following insurance agreement under which insurance business may be liable to satisfy all or part of a possible judgment in this case or to indemnify or reimburse Compass or its related entities for payments made to satisfy any judgment:

A. Compass' insurance agreement with Willis Limited for professional indemnity

during the period of September 30, 2018 to September 29, 2019, unique market reference number B080128401P18, a copy of which is enclosed herewith as CG-0032646, CG-0032661, CG-0032720, and CG-0032701.

Dated: November 1, 2022

Respectfully submitted,

COMPASS GROUP USA, INC.

By: /s/ Joseph C. Wylie II

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### **CERTIFICATE OF SERVICE**

This is to certify that on November 1, 2022, the foregoing document was served via electronic mail upon the following counsel of record:

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